

**REMARKS**

Applicant wishes to thank the Examiner for the very thorough consideration given the present application. The Examiner's Office Action of **March 15, 2000** has been received and its contents carefully noted. Filed concurrently herewith is a *Request for a One (1) Month Extension of Time* that extends the shortened statutory period for response to **July 15, 2000**. Accordingly, Applicant respectfully submits that this response is timely filed.

Claims 80-103 were pending in the present application prior to the aforementioned amendment. By the above actions, claims 80, 82, 85, 88, 91, 94, 97, 100 and 103 have been amended and new claims 104-123 have been added to recite additional protection to which applicant is entitled. Accordingly, claims 80-123 are now pending herein, and, for the reasons set forth in detail below, are believed to be in condition for allowance.

Initially, the Office Action rejects claims 80, 81, 83-84, 86-87 and 89-90 under 35 U.S.C. §102(e) as being unpatentable over *Zhang et al.* (Hereinafter "*Zhang*"). This ground of rejection is respectfully traversed for the following reasons and favorable consideration is requested in view thereof.

It shall be noted that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *In re Verdegaal Bros.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). For the reasons that follow, it is respectfully submitted that *Zhang* fails to disclose each and every claimed feature of the present invention.

The present invention is related to a multi-chamber system. In particular, the multi-chamber system of the present invention comprises a chamber for irradiating a light to a semiconductor film formed over a substrate, a chamber for depositing a gate insulating film on a semiconductor film, and a chamber for taking the substrate out of the multi-chamber system. While *Zhang* appears to disclose a chamber for depositing an insulating film (Col. 7, lines 15-17), it, however, fails to teach, disclose or reasonably suggest that the insulating film is a gate insulating film, as disclosed in the present invention. Even assuming, *arguendo*, that the insulating film in *Zhang* is a gate insulating film, *Zhang* fails to disclose a chamber for depositing the insulating film on the semiconductor film.

*fails to point out what is not taught by Zhang*

*apparatus claims not method claims*

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In addition, the Office Action rejects claims 92-103 under U.S.C. §103(a) as being unpatentable over **Zhang** in view of **Begin et al.** (Hereinafter "**Begin**") and claims 82, 85, 88 and 91 as being unpatentable over **Zhang**. These grounds of rejection are respectfully traversed for the following reasons and favorable consideration is requested in view thereof.

It should be noted that three criteria must be met to establish a *prima facie* case of obviousness. M.P.E.P. §2143. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to of ordinary skill in the art, to modify the reference or to combine reference teachings to achieve the claimed invention. *Id.* Second, there must be a reasonable expectation of success. *Id.* Last, the prior art must teach or suggest all the claim limitations. *Id.*

In the present application, the Applicant respectfully contends that the Office Action has failed to set forth a *prima facie* case of obviousness and the present invention is patentably distinct over the prior art in view thereof. It has been stated that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to a skilled artisan. In re Fine, 837 F.2d 1071, 5 USPQ.2d 1596 (Fed. Cir. 1988). Applicant respectfully submits that **Zhang**, alone or as modified by **Begin**, fail to teach, disclose or reasonably suggest a gate insulating film, as disclosed in the present invention. As discussed *supra*, even under the assumption that the insulating film in **Zhang** is in fact a gate insulating film, **Zhang** nonetheless fails to disclose a chamber for depositing the insulating film on a semiconductor film irradiated with a laser light. In addition, there is no motivation to modify the **Zhang** in supplying **Begin** since **Begin** also fails to disclose the same features.

Since both **Zhang** and **Begin**, alone or in combination, fail to teach, disclose or reasonably suggest each and every feature of the claimed invention, Applicant respectfully requests that the rejection of the pending claims be reconsidered and withdrawn in view thereof.

For all of the above reasons, it is respectively asserted that claims 80-123 are now in proper condition for allowance. Reconsideration of these claims in view of the above

comments is respectively requested. If the Examiner feels that any further discussions would be beneficial in this matter, it is requested that the undersigned be contacted.

Respectfully submitted,

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